Our ref: Q240461
Your ref: PP-13729872
Email: [redacted]
Date: 14 February 2025

[redacted]
Planning Department
Dartford Borough Council
Civic Centre
Home Gardens
Dartford
DA1 1DR

For the attention of [redacted]

Dear [redacted]

External Digital Signage at Bluewater Shopping Centre

On behalf of Blueco (the "Owners"), we have submitted three applications through the Planning Portal, all requesting full planning permission and advertisement consent for digital signage and a supporting structure at three separate locations within Bluewater Shopping Centre (also referred to in this letter as the "centre"). These comprise:

- Application 1 (PP-13729872) – located east of the M&S car park
- Application 2 (PP-13731204) – located on the last roundabout adjacent to the bus terminal
- Application 3 (PP-13731387) – located on Chestnut Avenue within the central reservation

The proposals form the first step in a wider programme of external improvements being made across the centre as an attempt to keep the commercial environment attractive, dynamic and interesting. The provision of digital signage will provide the users of Bluewater with a modern environment that provides retailers with a platform to advertise their brands, and the opportunity for the Owners to market specific events and experiences taking place in the centre.

This letter provides a summary of each application and is to be read alongside the full scope of submission documents as confirmed below. The scope and content of the submissions was discussed and agreed with the Council through pre-application discussions.

The following documents have been submitted in support of all three applications:

- This Cover Letter (submitted for all three applications)
- Design and Access Statement ("DAS")
- A suite of application drawings (refer to drawing schedule at Annex 1)

The requisite planning application fees have been paid via the Planning Portal and calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended). This is £293 for each full planning application and £578 for each advertisement application, as confirmed in the pre-application feedback letter dated 15 November 2024.

Planning Background and History

All sites are located within Bluewater Shopping Centre which was granted permission outline planning permission (LPA ref. DA/88/0336/OUT) by the Secretary of State in May 1990 for the development of a regional shopping centre with recreational and leisure facilities. Other significant consents at Bluewater include the large extension (the West Village) to provide up to 30,000 sq.m of additional retail floorspace (LPA ref.16/01207/OUT), and the change of use of the former Glow Events venue to a cinema and other leisure uses (LPA ref. 20/00156/VCON).

Bluewater is formed of a triangular pedestrian circuit, with shopping and leisure 'villages' located at various points off the malls. It is located in a former chalk quarry and surrounded by an inner access road, Bluewater Parkway, which allows access to the decked and surface level car parking and public transport interchange. The complex itself is entirely commercial in nature and segregated from nearby uses due to the surrounding cliffs and lakes. The nearest residential uses are located beyond the cliffs and views to these from each application site are obstructed the level difference, as well as trees and vegetation.

Pre-Application Advice

Pre-application discussions were held with Dartford Borough Council on 9 September 2024 with planning and design officers. Officers welcomed the design of the structures, noting it was of "high-quality". Officers particularly welcomed the references to local architecture. Officers raised no objection in respect of the principle of digital signage and associated structures in their feedback letter dated 15 November 2024. Concerns that were raised and how these have been addressed are set out below:

- **Officers found the size of Screen 1 and the associated structure to be detrimental to amenity.** In response to these comments, the size of the screen has been reduced 1.1m in height and 1.8m in width; and size of the structure has reduced by 1.5m in height and 2.7m in width. The proposals will also replace existing signage that has been in place for approximately 12 years with new modern signage with the same dimensions. The presence of advertising in this location is therefore acceptable.
- **Officers raised concerns with the location of Screen 2, noting it would be located near a four-way junction**. In response to this, an alternative location was identified. This location includes an existing large sign which will be replaced with the proposals. Officers noted this new location would still be detrimental to amenity. This is noted, however, but similar to Screen 1, the proposals in this location will also replace an existing screen that

has been in place for approximately 12 years with new modern signage with the same dimensions. Overall, the proposals will have a negligible impact on amenity by replacing an existing sign with a more suitably designed structure rather than introducing more signage.

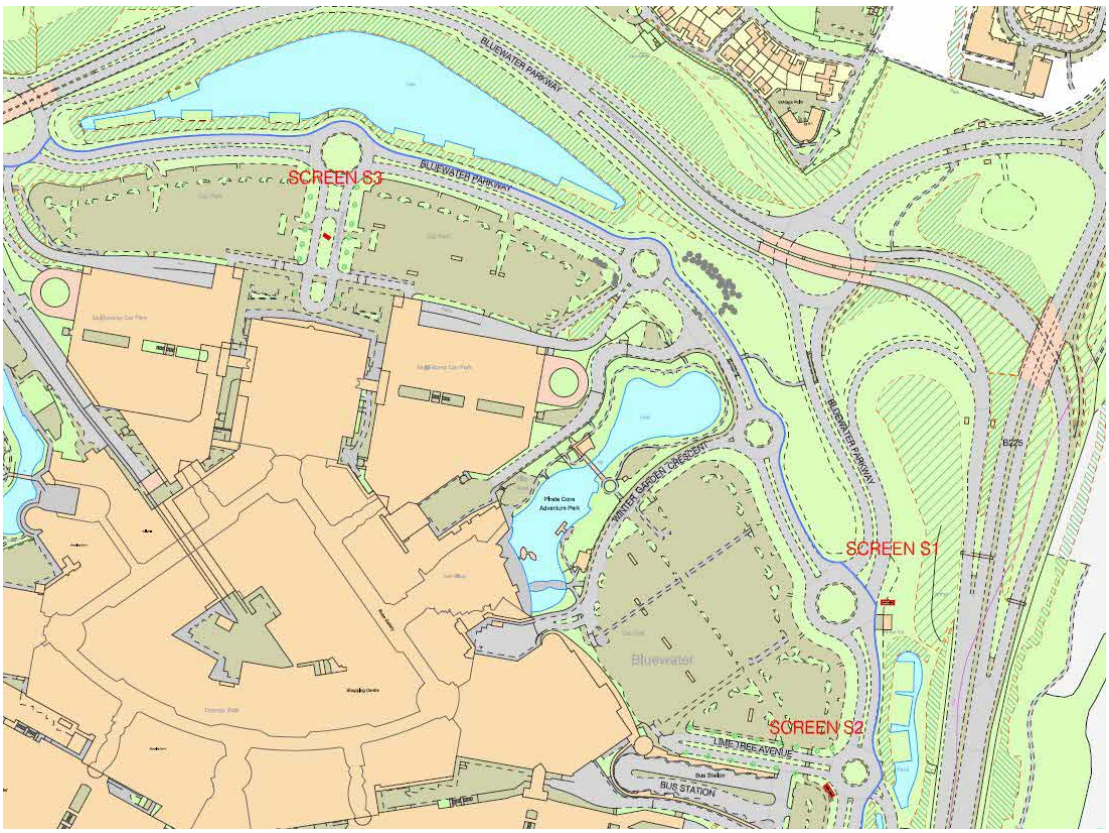
- **Officers found the location of Screen 3 was unsuitable and detrimental to amenity**. In response to these comments, the overall scale and width of the structure has significantly reduced to a slimmer design. Overall it has reduced 1m in height and 5m in width.

In general, the proposed signage is located in a commercial development where signage and advertisements are not uncommon and will not be visible to nearby residents and therefore not affect their amenity, with amenity considerations related to visual amenity within the Bluewater itself. Further explanation of the proposed is provided below.

Proposed Advertisements and Supporting Structures

The applications hereby enclosed all seek full planning permission and advertisement consent for a digital screen and supporting structure across three separate locations within the approach roads / internal feeder roads at Bluewater Shopping Centre as illustrated in Figure 1 below.

Figure 1: Location of proposed signage



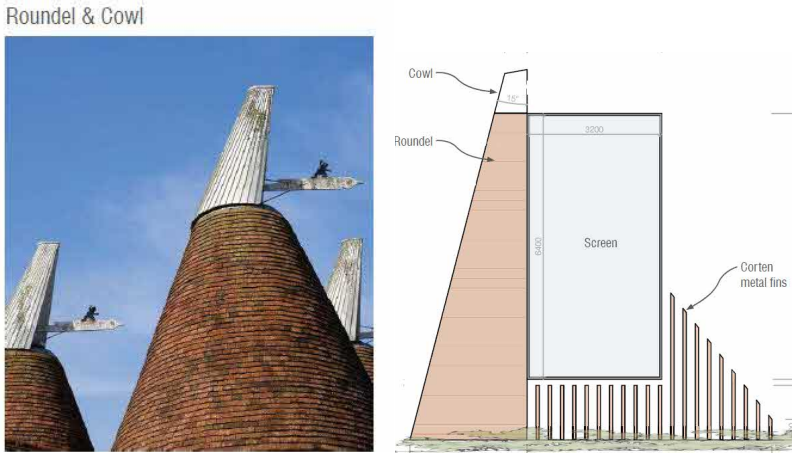
As explained above, the proposals form the first step in a wider programme of external improvements being made across the centre as an attempt to keep the commercial environment attractive, dynamic and interesting. Bluewater is now 25 years old and so it is important the Owners invest not only internally, but externally, to provide an attractive commercial environment from the beginning of the customer journey.

The digital screens are intended to welcome customers as they arrive and become a key feature within the external areas and key entry points of the centre. It is crucial centres like Bluewater evolve to continue to be relevant and provide an environment that welcomes customers, encourages them to stay, and use the centre as a social space. Guest experience is key to the success of Bluewater as this is an important in securing repeat visitation. The provision of digital signage within the proposed locations will enhance the visual appeal of the commercial area in contrast to traditional static signage (which part of the proposals seek to replace) and provide the unique opportunity for retailers to advertise their brands and provide real-time updates with sales, attracting customers thereby facilitating economic growth.

All three digital screens will be fixed on a steel corten structure. Whilst the exact size of each structure will differ across the three locations, the design and appearance will match in style. The concept of the design has been inspired from the 17th century Oast Houses (which originate in Kent) in terms of form, material palette and look.

Figure 2 below provides extracts from the Design and Access Statements, showing an image of the Oast Houses against the proposals. As illustrated below, the screens will be cantilevered in a similar way the wind vein; slatted elements will mimic the slatted floor found in the Oast Houses; and the cowl will be coloured white and tilted to represent the detailing of the roundel. As a result, the design provides a striking and sculptural information point that nods to the historic architecture of Kent.

Figure 2: Extracts from the Design and Access Statement



The structures will not conflict with the existing landscaping and greening. Any adjacent existing planting, such as hedging and mature trees, will be retained.

Brightness levels will be kept to suitable level at 200cd/m. Advert changes will be set at an appropriate level. Screen content will rotate on a loop of commercial advertising and centre messaging which will vary dependant on the amount of content at the given time.

The specific details of each sign and structure is explained in turn below. Further details are provided in the accompanying Design and Access Statements provided for each application.

Application 1: Screen 1

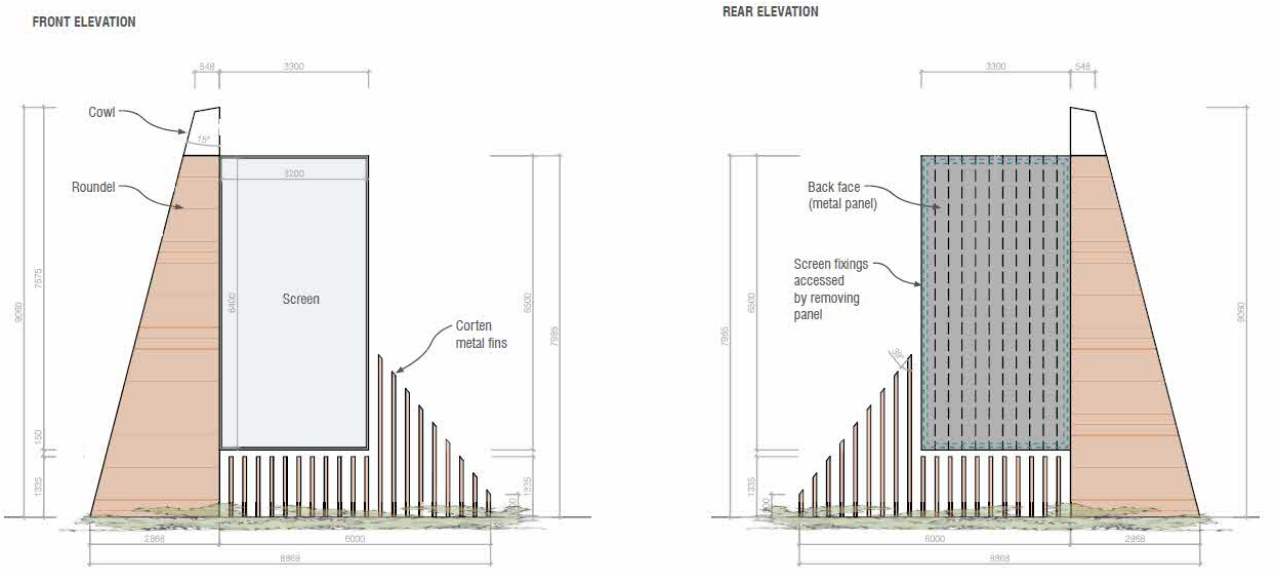
Full planning permission and advertisement consent is sought for one single sided digital display and supporting structure on the eastern side of the centre and to the east of the perimeter road, adjacent to the roundabout that it to the east of the M&S car park.

This application has been submitted via the Planning Portal under reference **PP-13729872**.

The screen will measure 6.4m in height and 3.2m in width. It will measure 1.3m from the height of the ground to the base of the advertisement. The height of the proposed supporting structure is 9m which will extend 8.8m in width from the edge of the roundel to the finish slats. The screen will be secured with a casement in aluminium metal and box steel support frame.

The extent of Screen 1 is illustrated below.

Figure 3: Dimensions of Screen 1



Application 1: Screen 2

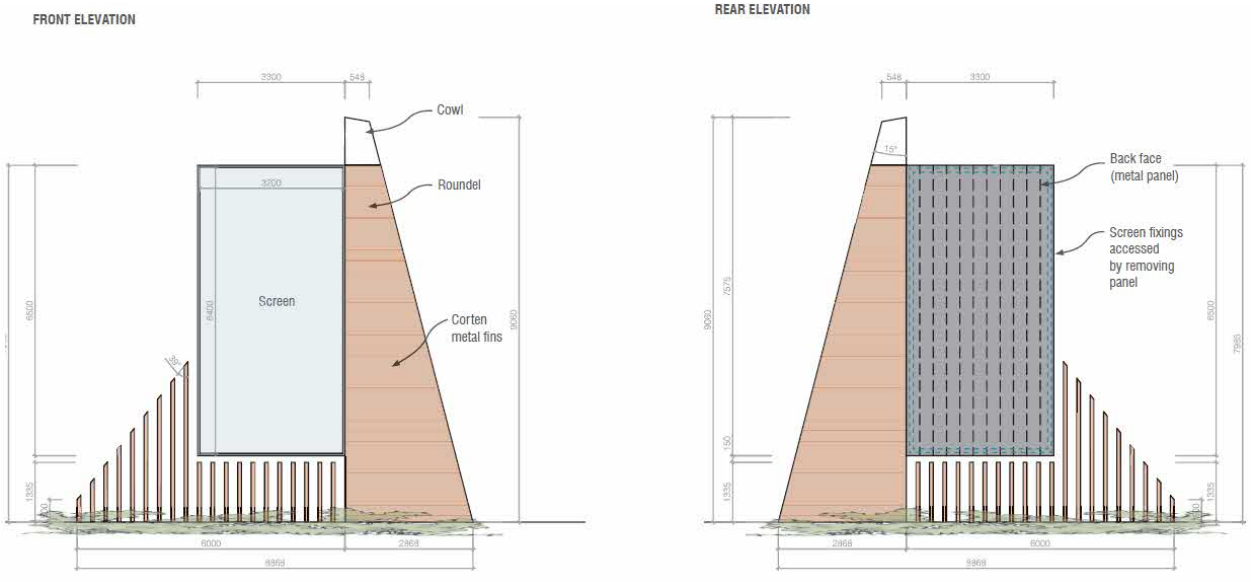
Full planning permission and advertisement consent is sought for one single sided digital display and supporting structure adjacent to the last roundabout along the primary Bluewater ring road B255 in the south east part of the centre.

The application has been submitted via the Planning Portal under reference **PP-13731204**.

The screen will measure 6.4m in height and 3.2m in width. It will measure 1.3m from the height of the ground to the base of the advertisement. The height of the proposed supporting structure is 9m which will extend 8.8m in width from the edge of the roundel to the finish slats. The screen will be secured with a casement in aluminium metal and box steel support frame.

The extent of Screen 2 is illustrated below.

Figure 4: Dimensions of Screen 2



Application 1: Screen 3

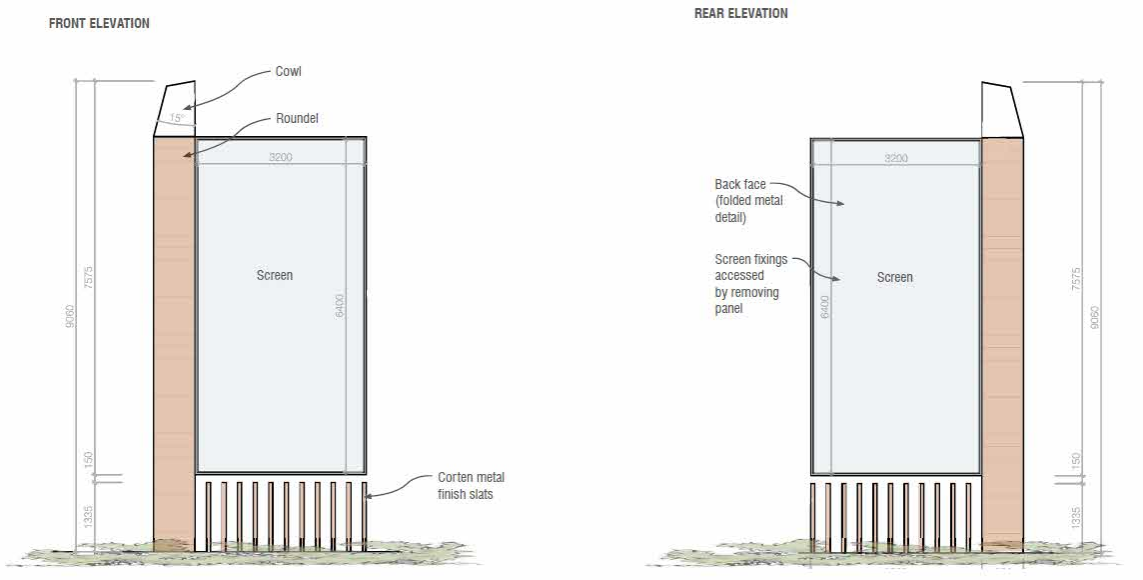
Full planning permission and advertisement consent is sought for two single sided digital displays and supporting structure on Chestnut Avenue within the central reservation.

The application has been submitted via the Planning Portal under reference **PP-13731387**.

The screen will measure 6.4m in height and 3.2m in width. It measure 1.3m from the height of the ground to the base of the advertisement. The height of the proposed supporting structure is 9m which will extend 4.1m in width from the edge of the roundel to the finish slats. The screen will be secured with a casement in aluminium metal and box steel support frame.

The extent of Screen 3 is illustrated below.

Figure 5: Dimensions of Screen 3



Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the “Regulations”). Regulation 3 states that advertising should be controlled in the interest of amenity and public safety, taking account of the provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The relevant planning policy, in so far as it relates to the application site, comprises the Dartford Local Plan (2021) and policies map.

At the national level, the National Planning Policy Framework (NPPF) (December 2024) and National Planning Practice Guidance (NPPG) (published March 2014) are material planning considerations in local decision making.

Paragraph 141 of the NPPF states advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

NPPG Paragraph 026 on advertisements notes that local planning authorities can control the display of advertisements in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

NPPG Paragraph 079 explains that “amenity” includes aural and visual amenity and that factors relevant to amenity include the local characteristics such as the presence of any feature of historic, architectural, cultural or similar interest. It is understood to mean: *“the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement”.*

In relation to public safety, NPPG Paragraph 067 specifically notes that there *“are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality”*. It notes that all advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety.

At the local level, the Dartford Local Plan (2021) and policies map identifies Bluewater as a regional shopping centre and within a Biodiversity Opportunity Area.

Policy M21 relates to Bluewater. Part 1 states that the appropriate evolution of Bluewater, to maintain its economic contribution, quality and distinctiveness as a contemporary regional centre, will be supported. Development for activities are required to retain and enhance Bluewater’s parkland setting under Part 2d.

Policy M14 relates to biodiversity and states that planning permission will not be granted uncles it can be demonstrated it does not adversely the biodiversity value.

Policy M1 relates to design and Part 5 relates to signage and advertisements. It states that these must be of a scale and design that is sympathetic to the building and locality and must not have a negative impact on visual amenity, public safety or the safe and convenient movement of pedestrians, cyclists and vehicles.

In relation to transport and highway safety, Policy M15 requires development to be appropriately located and make suitable provision to minimise and manage transport impacts which arise. Policy M16 notes that adverse effects from the travel and movement issues associated with any development, including on amenity or the environment, must be minimised.

Planning Considerations

Principle of Development

The principle of signage within Bluewater is firstly established by the setting of the centre being a regional shopping centre which is entirely commercial in character and where signage is needed to help direct customers. Furthermore, due to the presence of the surrounding cliffs and lakes, the centre is entirely segregated from other surrounding uses, particularly more sensitive residential uses, thereby mitigating against any impacts to amenity and public safety.

Digital media is extensively used in commercial environments with retail being a popular area of focus. From a brand perspective, being able to target shoppers close to point of sale provides the best

possible moment in time to influence buying behaviour. The presence of the external screens is therefore, to an extent, an extension of the retail experience, acting as shop windows and helping direct customers to retailers. The principle of the proposals are therefore entirely appropriate within the setting of Bluewater Shopping Centre.

The location of Screens 1 and 2 were chosen on the basis they would replace existing signage. Screen 1 will replace replacing two existing signs – a welcome sign; and an advertisement with a supporting structure; and Screen 2 will replace one existing poster display positioned on a large structure. The display area of the existing advertisements is approximately 6m in width and 3.3m in height, closely resembling the proposed replacement screens. The existing supporting structures are also of a similar scale to the proposals. These have been in place for 10 years.

The principle of advertising via a large supporting structure in these two roadside locations is established through the presence of the existing signage and is therefore acceptable.

Both existing advertisements comprise a poster display positioned in a large black metal structure. The structures are dated and in need of refurbishment. The proposals will provide a more visually attractive structure that is of a scale and design that that is sympathetic to the building and locality, as required by Policy M1. Furthermore, presence of existing signage establishes the principle of signage in this location, meaning the proposals will enhance the environment, rather than adding to the visual clutter.

As described above, Bluewater Shopping Centre is naturally enclosed by the surrounding cliffs, creating a distinct and self-contained environment. Set within a former quarry, its geography provides a unique, enclosed setting, which give it a secluded and commercial character. The location of Screen 3 will be sensitively located and easily visible on the approach, without blocking views to the centre itself. In addition to brand advertising, the flexibility of digital signage also enables the opportunity to promote non-commercial or seasonal events at the centre. The digital screens can be used to provide generic centre marketing and this is crucial to an evolving as part of the retail eco system. The location of Screen 3 will capitalise on this due to its prominent location, responding directly to Policy M21 which supports proposals that maintain Bluewater's economic contribution, quality and distinctiveness as a contemporary regional centre. The principle of locating signage within this location is therefore acceptable.

Impact on Amenity

As explained above, Screens 1 and 2 will involve the replacement of existing signage. Impacts to amenity will therefore be positive as the proposals will enhance the environment through the addition of a striking and sculptural information point.

The design and appearance of the structures is deliberate in that ties in with the locality – the stylistic Oast design and cladding colour is a nod to rural Kent where Oast houses can still be seen and are a feature of the local landscape. The proposals provide a visual connection to the historic architecture

of Kent which will enhance the local scene. Overall, the proposals are considered to be of high quality and one that goes beyond traditional digital or poster advertising displays.

All screens and supporting structures have been located and orientated in a way which ensures clear visibility to approaching traffic whilst ensuring it does not block views to the centre nor conflict with existing street furniture, trees and buildings. The scale of Screen 3 was in particular carefully considered in the context of the sightlines and views to the John Lewis building.

The proposals will individually and collectively not cause any impacts on amenity because:

- The signage and supporting structures are of a high-quality design that will not add unacceptable visual clutter nor harm the appearance and character of the area, but rather enhance the existing shopping environment (as illustrated below).
- Lux levels for all signs would be set an at appropriate illumination at 200cd/m (which is an industry standard). The signs will be turned off at 11pm and turned back on at 7am.
- The nearest residential properties will be obstructed by the level difference, as well as trees and vegetation, meaning any impacts to residential amenity would be negligible.
- The signage will not negatively impact amenity with regards to the local characteristics as they are entirely appropriate within Bluewater's commercial setting.
- The adverts will not create any noise or other disturbance which could adversely impact on residential amenity.

Figure 6: Existing and proposed view of each application

Impact on Public and Highways Safety

The proposed signage will not cause distractions that could impact highway or public safety.

As set out in the NPPG, it is less likely for road safety problems to arise if the advertisement is within a commercial locality. The nature of the internal roadways and commercial landscape of Bluewater, which is also naturally enclosed by the surrounding cliffs, provides an entirely appropriate setting for signage.

The proposed signage will be located within a commercial setting, being Bluewater Shopping Centre. The proposals are proportionate to its designated function as a regional shopping centre, and they will maintain its economic contribution, quality and distinctiveness as required by Policy M21.

The locations were chosen as they are all visible from vehicular traffic and designed not to impact the operation of the centre. The scale of the screens are also large enough so that the information displayed can be clearly legible and understood when approaching it in a moving vehicle.

The screens are also located in areas of slow moving traffic. A new controlled junction is due to be introduced near Screen 1, associated with the Bean Road Tunnel, which will slow traffic further in the vicinity of the replacement screen. Screen 1 is located on the approach to the Bluewater Parkway

roundabout opposite the Winter Garden car park. This replaces one large permanent screen, a permanent “welcome sign” and a temporary variable messaging screen. As such, the proposals reduce street clutter and potential for driver distraction coming from multiple sources. As the approach incudes a segregated left turn lane (SLTL), a stopping site distance (SSD) / forwarding visibility splay of 90m should be maintained through the SLTL. The proposed screen and solid fin on the left side fall entirely outside this visibility envelope. A small section of the low height corten fins extend slightly into the envelope, however the fins are not a solid structure and are set 220mm apart therefore ensuring forward visibility is maintained for drivers. The screen is concluded to be a benefit in terms of driver safety as a result of the consolidation of existing multiple signs and the set back from the visibility envelope.

Screen 2 is a direct replacement of an existing screen. The existing screen is located on the corner of the roundabout between the Bluewater Parkway roundabout (South) and Winter Garden Crescent (West) of the junction. There is a pedestrian crossing located approximately 20m back from the roundabout on the Winter Garden Crescent and as such, visibility must be maintained from the southern arm entry to the roundabout, across the junction to both sides of the crossing to ensure pedestrians waiting to cross can be seen by drivers turning into the arm. The existing screen partially protrudes into the visibility envelope. However, it is raised so that the vertical visibility is maintained through to the crossing, with some minor instruction from the signage poles. The proposes screen is set back entirely behind this visibility envelope and is therefore considered an improvement in relation to visibility and pedestrian/driver safety.

Screen 3 is located on the central reservation along Winter Garden Crescent. It does not impede driver nor pedestrian visibility and is therefore concluded to be appropriate from a highways safety perspective.

Signage being located near junctions has been accepted and approved in the Borough and across the UK as a whole, and in much more contentious settings. The commercial setting within the quarry creates a sense of seclusion and privacy that is different other advertisements located in busy traffic environments.

No moving images will be proposed and drivers will be able to see the signage at a far distance back when approaching.

Two out of three locations will also result in replacing existing signage which has been in place for over 10 years and no issues relating to public safety have arose as a result of this signage.

The adverts will not hang over the public highway and will not cause a hazardous distraction.

Finally, ensuring continuity between design of the screens reduces sense of street clutter. Having continuous design and clear identity also means the signage is less distracting for drivers.

In summary, the proposals will not cause any adverse impact on public safety due to the nature of their siting within a regional shopping centre site.

Summary

The proposed advertisements and supporting structures are appropriate for the commercial location and supported by the above planning policy and guidance. Individually, the signage would neither dominate over, nor compete with the surroundings by virtue of its size. Cumulatively, the combined visual impact of the proposals would not be read as an over proliferation of activity.

The proposals have directly responded to feedback received from DBC and specific concerns related to their scale and size. In this feedback, Officers raised no objection in respect of the principle of digital signage and associated structures.

Both individually and cumulatively, the replacement of the existing signage further establishes the principle of advertising at Bluewater Shopping Centre and provides an opportunity to improve on the environment and shopping experience.

The proposals will not cause any adverse impact on amenity or public safety for the following reasons:

- The proposed signage is proportionate to the scale and size of its surroundings and they will not add unacceptable visual clutter;
- The proposed signage will be designed with high quality finishes, which reflect the materiality of historic Kent architecture at a scale appropriate to the size and modern appearance of Bluewater Shopping Centre;
- The proposed signage will not create any adverse impacts on residential amenity. They will not create noise or any other disturbance; and
- The proposed signage is proportionate to the function of Bluewater Shopping Centre and entirely appropriate within its commercial setting.

The Design and Access Statements and drawings submitted for each application demonstrates that the advertisements and associated structures will individually and collectively be well integrated with their context and provide a visual connection to the historic architecture of Kent which will enhance the local scene.

The proposed signage will help advertise the centre and brands to customers and it forms part of a wider programme of improvements that being made across the centre.

It is therefore considered that the proposed advertisements will not, by nature of their design or siting, have any detrimental impact upon amenity nor public safety and they are therefore in accordance with planning policy at all levels. Accordingly, the proposals are considered acceptable.

I trust that the enclosed application is acceptable, and I look forward to receiving confirmation of validation in due course. Please do not hesitate to contact me should you require any further information.

Yours sincerely

[redacted]

Senior Planner

enc. Drawing Schedule

[redacted]

Drawing Schedule

Drawing Title	Drawing Reference	Revision
Application 1		
Screen 1 Site Location Plan	1066-LDA-BWS-XX-DR-A-08100	P02
Screen 1 Existing GA Plan	1066-LDA-BWS-XX-DR-A-08101	P01
Screen 1 Proposed Block Plan	1066-LDA-BWS-XX-DR-A-08002	P03
Screen 1 Proposed Elevations	1066-LDA-BWS-XX-DR-A-08005	P03
Screen 1 Proposed GA Plan	1066-LDA-BWS-XX-DR-A-08008	P03
Typical Screen Details	1066-LDA-BWS-XX-DR-A-08011	P01
Application 2		
Screen 2 Site Location Plan	1066-LDA-BWS-XX-DR-A-08200	P03
Screen 2 Existing GA Plan	1066-LDA-BWS-XX-DR-A-08201	P01
Screen 2 Proposed Block Plan	1066-LDA-BWS-XX-DR-A-08003	P03
Screen 2 Proposed Elevations	1066-LDA-BWS-XX-DR-A-08006	P03
Screen 2 Proposed GA Plan	1066-LDA-BWS-XX-DR-A-08009	P03
Typical Screen Details	1066-LDA-BWS-XX-DR-A-08011	P01
Application 3		
Screen 3 Site Location Plan	1066-LDA-BWS-XX-DR-A-08300	P02
Screen 3 Existing GA Plan	1066-LDA-BWS-XX-DR-A-08301	P01
Screen 3 Proposed Block Plan	1066-LDA-BWS-XX-DR-A-08004	P03
Screen 3 Proposed Elevations	1066-LDA-BWS-XX-DR-A-08007	P03
Screen 3 Proposed GA Plan	1066-LDA-BWS-XX-DR-A-08010	P03
Typical Screen Details	1066-LDA-BWS-XX-DR-A-08011	P01